Anniston PCBs, Anniston, Calhoun County, AL

POLREP #17, 09/02 to Present

ACTIONS TO DATE (This Polrep covers the period from September 2002 to present)

The Anniston PCB Site Community Relations Center (CRC) continues to operate under the existing site standard operating procedures. There is one START contractor and one SEE employee on-site supporting EPA in the operation of the center. The CRC personnel continue to maintain the office space and conduct file and data management in support of the project. To date, the CRC has received 6,564 calls and had 1,029 visitors. The center allows EPA to maintain consistent contact with the community and lends the ability to disseminate information to the community.

The EPA Community Relation Specialist for the site conducted the following actions: Notified surrounding residents and community groups of on-going removal activities.

Solutia, Inc. (Solutia) continues to conduct sampling and remediation pursuant to the EPA Administrative Order on Consent (AOC) which became effective on October 5, 2001. The following provides a summary of the sampling and remediation actions to date:

Summary of Properties Sampled:

908 properties have been sampled to date by EPA and Solutia Inc. (Solutia)

Out of these 908 properties Solutia has sampled 274 properties

Out of these 908 properties 446 had composite samples collected

Composite results received to date are summarized below:

285 properties have data reflecting < 1 ppm PCB

51 properties have data reflecting 1 and <2 ppm PCB

72 properties have data reflecting 2 and <10 ppm PCB

25 properties have data reflecting 10 ppm PCB

Status of Removal Properties:

25 properties have been identified for a removal action

12 cleanups are complete (3 of which are properties that have been purchased by Solutia)

1 property is to be or has been purchased by Solutia

11 properties have not provided access (litigants)

1 properties have not provided access (non-litigant)

EPA continues oversight of PRP activities. Sampling activities for the 9th Street Ditch are expected to commence at the end of this month.

The 60 day public comment period for the CD ended on June 3, 2002. EPA and DOJ are currently reviewing the comments.

Future Actions

EPA will continue to conduct oversight of Solutia's work conducted under the AOC.

EPA will continue efforts to obtain access for Solutia to conduct sampling and cleanups.

Continue operation of the CRC.

POLREP #16, 08/02 to Present ACTIONS TO DATE

The Anniston PCB Site Community Relations Center (CRC) continues to operate under the existing site standard operating procedures. There is one START contractor and one SEE employee on-site supporting EPA in the operation of the center. The CRC personnel continue to maintain the office space and conduct file and data management in support of the project. To date, the CRC has received 6,250 calls and had 1,015 visitors. The center allows EPA to maintain consistent contact with the community and lends the ability to disseminate information to the community.

The EPA Community Relation Specialist for the site conducted the following actions: Notified surrounding residents and community groups of on-going removal activities.

Solutia, Inc. (Solutia) continues to conduct sampling and remediation pursuant to the EPA Administrative Order on Consent (AOC) which became effective on October 5, 2001. The following provides a summary of the sampling and remediation actions to date:

Summary of Properties Sampled:

899 properties have been sampled to date by EPA and Solutia Inc.

Out of these 899 properties Solutia has sampled 265 properties

Out of these 899 properties 423 had composite samples collected

Composite results received to date are summarized below:

263 properties have data reflecting < 1 ppm PCB

51 properties have data reflecting 1 and <2 ppm PCB

66 properties have data reflecting 2 and <10 ppm PCB

25 properties have data reflecting 10 ppm PCB

Status of Removal Properties:

25 properties have been identified for a removal action

11 cleanups are complete

4 properties are to be or have been purchased by Solutia Inc.

(1 remaining for scheduled cleanup in August)

11 properties have not provided access (litigants)

1 properties have not provided access (nonlitigant)

EPA continues oversight of PRP activities.

The 60 day public comment period for the CD ended on June 3, 2002. EPA and DOJ are currently reviewing the comments.

Future Actions

EPA will continue to conduct oversight of Solutia's work conducted under the AOC. EPA will continue efforts to obtain access for Solutia to conduct sampling and cleanups. Continue operation of the CRC.

POLREP #15, 07/02 to Present ACTIONS TO DATE

The Anniston PCB Site Community Relations Center (CRC) continues to operate under the existing site standard operating procedures. There is one START contractor and one SEE employee on-site supporting EPA in the operation of the center. The CRC personnel continue to maintain the office space and conduct file and data management in support of the project. To date, the CRC has received 6,356 calls and had 1,026 visitors. The center allows EPA to maintain consistent contact with the community and lends the ability to disseminate information to the community.

The EPA Community Relation Specialist for the site conducted the following actions: Notified surrounding residents and community groups of on-going removal activities.

Solutia, Inc. (Solutia) continues to conduct sampling and remediation pursuant to the EPA Administrative Order on Consent (AOC) which became effective on October 5, 2001. The following provides a summary of the sampling and remediation actions to date:

Summary of Properties Sampled:

899 properties have been sampled to date by EPA and Solutia Inc. Out of these 899 properties Solutia has sampled 265 properties Out of these 899 properties 423 had composite samples collected Composite results received to date are summarized below: 263 properties have data reflecting < 1 ppm PCB 51 properties have data reflecting 1 and <2 ppm PCB 66 properties have data reflecting 2 and <10 ppm PCB 25 properties have data reflecting 10 ppm PCB

Status of Removal Properties:

25 properties have been identified for a removal action

11 cleanups are complete

4 properties are to be or have been purchased by Solutia Inc.

(1 remaining for scheduled cleanup in August)

11 properties have not provided access (litigants)

1 properties have not provided access (nonlitigant)

EPA continues oversight of PRP activities.

The 60 day public comment period for the CD ended on June 3, 2002. EPA and DOJ are currently reviewing the comments.

Future Actions

EPA will continue to conduct oversight of Solutia's work conducted under the AOC. EPA will continue efforts to obtain access for Solutia to conduct sampling and cleanups. Continue operation of the CRC.

POLREP #13, 05/02 to Present ACTIONS TO DATE

The Anniston PCB Site Community Relations Center (CRC) continues to operate under the existing site standard operating procedures. There is one START contractor and one SEE employee on-site supporting EPA in the operation of the center. The CRC personnel continue to maintain the office space and conduct file and data management in support of the project. To date, the CRC has received 6,107 calls and had 1,001 visitors. The center allows EPA to maintain consistent contact with the community and lends the ability to disseminate information to the community.

The EPA Comunity Relation Specialist for the site conducted the following actions: Notified surrounding residents and community groups of on-going removal activities.

Solutia, Inc. (Solutia) continues to conduct sampling and remediation pursuant to the EPA Administrative Order on Consent (AOC) which became effective on October 5, 2001. The following provides a summary of the sampling and remediation actions to date:

Summary of Properties Sampled:

876 properties have been sampled to date by EPA and Solutia Inc.

Out of these 876 properties Solutia has sampled 242 properties

Out of these 876 properties 404 had composite samples collected

Composite results received to date are summarized below:

260 properties have data reflecting < 1 ppm PCB

51 properties have data reflecting 1 and <2 ppm PCB

65 properties have data reflecting 2 and <10 ppm PCB

25 properties have data reflecting 10 ppm PCB

Status of Removal Properties:

25 properties have been identified for a removal action

7 cleanups are complete

1 property has removal access and removal activities will commence 06/17/02

4 properties are to be or have been purchased by Solutia Inc.

11 properties have not provided access (litigants)

2 properties have not provided access (nonlitigant)

EPA continues oversight of PRP activities.

On June 11-12, 2002, EPA held a kickoff meeting for the proposed partial Consent Decree at the Solutia facility in Anniston, Alabama (removal personnel attended and participated in the meeting). The 60 day public comment period for the CD ended on June 3, 2002. EPA and DOJ are currently reviewing the comments.

Future Actions

EPA will continue to conduct oversight of Solutia's work conducted under the AOC.

EPA will continue efforts to obtain access for Solutia to conduct sampling and cleanups.

Continue operation of the CRC.

POLREP #11, 03/22/02-present ACTIONS TO DATE (This Polrep covers the period from March 2002 to present.

The Anniston PCB Site Community Relations Center (CRC) continues to operate under the existing site standard operating procedures. There is one START contractor and one SEE employee on-site supporting EPA in the operation of the center. The CRC personnel continue to maintain the office space and conduct file and data management in support of the project. To date, the CRC has received 6,107 calls and had 1,001 visitors. The center allows EPA to maintain consistent contact with the community and lends the ability to disseminate information to the community.

The EPA Comunity Relation Specialist for the site conducted the following actions: Notified surrounding residents and community groups of on-going removal activities. Pursued obtaining access agreements for properties requiring a removal action.

Solutia, Inc. (Solutia) continues to conduct sampling and remediation pursuant to the EPA Administrative Order on Consent (AOC) which became effective on October 5, 2001. The following provides a summary of the sampling and remediation actions to date:

Summary of Properties Sampled:

876 properties have been sampled to date by EPA and Solutia Inc. Out of these 876 properties Solutia has sampled 219 properties Out of these 876 properties 381 had composite samples collected Composite results received to date are summarized below: 243 properties have data reflecting < 1 ppm PCB 50 properties have data reflecting 1 and <2 ppm PCB 60 properties have data reflecting 2 and <10 ppm PCB 25 properties have data reflecting 10 ppm PCB

Status of Removal Properties:

25 properties have been identified for a removal action

6 cleanups are complete

2 properties have removal access and removal activities will commence 05/28/02

4 properties are to be or have been purchased by Solutia Inc.

12 properties have not provided access (litigants)

1 property needing additional ownership information

EPA continues oversight of PRP activities.

Future Actions EPA will continue to conduct oversight of Solutia's work conducted under the AOC.

EPA will continue efforts to obtain access for Solutia to conduct sampling and cleanups.

Continue operation of the CRC.

POLREP #11, 11/01 to Present ACTIONS TO DATE

The Anniston PCB Site Community Relations Center (CRC) continues to operate under the existing site standard operating procedures. There is one START contractor and one SEE employee on-site supporting EPA in the operation of the center. The CRC personnel continue to maintain the office space and conduct file and data management in support of the project. To date, the CRC has received 5,766 calls and had 985 visitors. The center allows EPA to maintain consistent contact with the community and lends the ability to disseminate information to the community.

The EPA Comunity Relation Specialist for the site conducted the following actions: Attended the Brownsfield Meeting in Anniston on February 28, 2002. Notified surrounding residents and community groups of the removal activities for 1209 Crawford Avenue. Submitted a press release for the recent removal action.

Solutia, Inc. (Solutia) continues to conduct sampling and remediation pursuant to the EPA Administrative Order on Consent (AOC) which became effective on October 5, 2001. The following provides a summary of the sampling and remediation actions to date:

Summary of Properties Sampled:

872 properties have been sampled to date by EPA and Solutia Inc.

Out of these 872 properties Solutia has sampled 206 properties

Out of these 872 properties 368 had composite samples collected

Composite results received to date are summarized below:

236 properties have data reflecting < 1 ppm PCB

49 properties have data reflecting 1 and <2 ppm PCB

60 properties have data reflecting 2 and <10 ppm PCB

23 properties have data reflecting 10 ppm PCB

Summary of Removal Properties:

23 properties have been identified for a removal action

1 cleanup is complete

1 cleanup is ongoing

3 properties have removal access and are scheduled to start week of 03/18/02

4 properties are to be or have been purchased by Solutia Inc.

1 property is being rented by Solutia

2 properties are vacant and the owners have agreed not to occupy the properties (Litigants)

11 properties have not provided access (9 are litigants)

On March 1, 2002, EPA notified Solutia that their 11th Street Ditch Removal Action response Work Plan was not approved. EPA and Solutia have had subsequent discussions regarding the work plan, and EPA anticipates the submittal of a revised work plan in the near future.

On March 4, 2002 EPA sent a letter to City of Oxford, City of Anniston and Calhoun County making recommendations regarding development/demolition actions in potential contaminated areas. On March 6, 2002 EPA met with Habitat for Humanity and City of Anniston representatives to discuss land disturbance activities and future Habitat projects.

Future Actions

EPA will continue to conduct oversight of Solutia's work conducted under the AOC.

EPA will continue efforts to obtain access for Solutia to conduct sampling and cleanups.

Continue operation of the CRC.

POLREP #10, 05/01 to Present ACTIONS TO DATE

Data results were received for the May 2001 field investigation conducted by EPA SESD. The primary focus of the investigation was the investigation of lead in the Anniston area; however, the sampling event included approximately 15 properties that were sampled for total PCBS. Results for these 15 properties indicated 5 properties with PCB levels

exceeding EPA's removal action level of 10 ppm. This brings the total number of properties identified to date that meet the removal criteria to 19.

The Anniston PCB Site Community Relations Center (CRC) continues to operate under the existing site standard operating procedures. There are two START contractors on-site supporting EPA in the operation of the center. Tetra Tech contractors have maintained the office space, data management, and continued support as directed by the On-Scene Coordinators and Task Monitor. To date, the CRC has received 4762 calls and had 880 visitors. The center allows EPA to maintain consistent contact with the community and lends the ability to disseminate information to the community.

A new Administrative Order on Consent (AOC) between EPA and Solutia, Inc. (Solutia) was signed and became effective on October 5, 2001. The new AOC includes all the requirements of the original AOC, but adds additional actions to the scope of work. These additional actions include the sampling and remediation of residential properties near Snow Creek in Oxford; sampling of properties that had previously only been field screened for PCB's by EPA; the maintenance of the parking lot cap covering PCB contaminated soils at the Oxford ball fields; and the sampling/remediation of any properties that received contaminated soil from the Mall, but have not been previously addressed by Solutia.

Solutia has submitted the proposed remediation plan for the 11th Street Ditch area. EPA is currently reviewing the proposal.

Solutia has completed the initial phases of residential sampling in the five zones designated under the initial AOC. Solutia has sampled approximately 150 properties to date within these zones. No additional properties exceeding EPA action level have been identified to date by this sampling. Solutia continues to attempt to obtain access for sampling in the zones; however, pending litigation continues to slow the process. EPA is currently attempting to obtain access for sampling on properties where Solutia was denied.

In July/August 2001, Solutia initiated and completed the 1st residential removal action at 717 Zinn Pkwy. Solutia has obtained access for cleanup of an additional property, and currently have that property scheduled for remediation in November. Access denial has hindered cleanup efforts.

Future Actions

EPA will continue to conduct oversight of Solutia's work conducted under the AOC.

EPA will continue efforts to obtain access for Solutia to conduct sampling and cleanups.

Continue operation of the CRC.

POLREP #8, 06/12/01 ACTIONS TO DATE (This Polrep covers the period from September 2000 to present. Future Polreps to be distributed approx. monthly.) During the week of September 18, 2000, the United States Environmental Protection Agency (EPA) Region 4, Science and Ecosystem Support Division (SESD) conducted a field investigation (Phase 6) with EPA Superfund Technical Assessment and Response Team (START) contractor support. The properties sampled consisted of residential and communal properties in the west Anniston area. Approximately 37 samples (from approximately 11 properties) were collected by composite sampling technique. All samples were analyzed for total polychlorinated biphenyls (PCBs). Thirty-three of the samples contained PCBs: 10 samples with total PCB levels below 1.0 mg/kg, 22 samples were equal to or greater than 1.0 mg/kg but less than 10 mg/kg, and 1 samples (from three different properties) contained total PCBs greater than or equal to 10 mg/kg. Elevated levels of lead were detected in four samples and ranged in levels from 690 mg/kg to 1,900 mg/kg.

During the week of December 4, 2000, the EPA Region 4, SESD conducted a field investigation (Phase 7) with EPA START contractor support. The properties sampled consisted of residential properties in Anniston and northern Oxford, Alabama. Approximately 22 samples (from 11 properties) were collected by composite sampling technique. All samples were analyzed for total PCBs. Twenty of the samples contained PCBs: 11 samples with total PCB levels below 1.0 mg/kg, 6 samples were equal to or greater than 1.0 mg/kg but less than 10 mg/kg, and 3 samples (from three different properties) contained total PCBs greater than or equal to 10 mg/kg. Elevated levels of lead were not detected in any of the samples taken during this event.

Data result letters for Phase 6 & 7 sampling were sent to each identified property owner and tenant. The letter indicates if there is or is not further action anticipated on each property and gives the owner or tenant a means of contacting EPA if they have any questions. A Data Availability Session for those who received result letters was held at the Anniston City Meeting in February 2001. EPA, Alabama Department of Environmental Management, Alabama Department of Public Health, Agency for Toxic Substances and Disease Registry and others were available to answer any questions or concerns from the owners/tenants.

In May 2001, the EPA Region 4, SESD conducted a field investigation with EPA START contractor support. The primary focus of the investigation was the investigation of lead in the Anniston area; however, the sampling event included approximately 15 properties that were sampled for total PCBS. These properties constituted the majority of the remaining properties EPA had been delayed in re-sampling due to access denial. We are currently awaiting the results from this sampling event and anticipate them within the next 4-8 weeks.

The Anniston PCB Site Community Relations Center (CRC) continues to operate under the existing site standard operating procedures. There are two START contractors on-site supporting EPA in the operation of the center. Tetra Tech contractors have maintained the office space, data management, and continued support as directed by the On-Scene Coordinators and Task Monitor. To date, the CRC has received 4762 calls and had 880 visitors. The center allows EPA to maintain consistent contact with the community and lends the ability to disseminate information to the community.

An Adminsitrative Order on Consent (AOC) between EPA and Solutia, Inc. (Solutia) was signed and became effective as of October 27, 2000. All initial removal work plans required pursuant to the AOC have been submitted to EPA and approved. Residential sampling in Zone 3 has been initiated by Solutia. Sampling along 11th Street ditch was initiated and completed by Solutia in April 2001. Solutia continues the process for obtaining access to sample in Zones 3, 2, 1 and the 9th st. creek area. EPA is overseeing all filed activities conducted by Solutia pursuant to the AOC.

In April 2001, EPA conducted a fund lead removal action consisting of constructing a fence to restrict access along a portion of the ditch near 9th Street. Residents had expressed concern regarding children accessing the contaminated ditch during the time between Solutia's characterization sampling of the ditch required under the AOC, and any future remediation of the ditch. Solutia declined to conduct the fencing activities; therefore EPA determined a fund lead action was warranted.

The EPA sampling to date has identified a total of 14 residential properties with composite sampling results indicating a total PCBS concentration equal to or greater than 10 mg/kg. Eleven of these properties are located in the western portions of Anniston and are within the areas of the AOC with Solutia. The other three properties are located near the flood plain of Snow creek in Oxford, Alabama. EPA is currently negotiating with Solutia to add this area into the AOC. Solutia has attempted to obtain access for the 11 properties covered under the current AOC. Full access was granted for 1 property. Partial access for subsurface sampling only was granted for 1 property. Access has been denied for the rest of the properties.

Future Actions

EPA will continue to conduct oversight of Solutia's work conducted under the AOC.

EPA will mail-out the remaining PCB data result letters once the data is received.

EPA will initiate the necessary actions to obtain access to properties for Solutia to conduct the required sampling and removal activities under CERCLA authorities.

Continue operation of the CRC.

POLREP #7, 12/05/00 ACTIONS TAKEN

In January of 2000, EPA OSC, ERRB and EPA Remedial Project Manager (RPM), South Management Branch, Waste Management Division, planned several phases of sampling for an integrated assessment at the Site. The OSC selected a combination of field screening techniques and fixed laboratory analyses for the sampling program and

reconnoiter the locations to be sampled for both soil and air sampling. The RPM selected the depth and distance from the residents based on the hazard ranking system criteria for listing a potential Superfund Site under the NPL. Both soil and air sampling strategies were defined and documented in Quality Assurance Project Plans/Sampling and Analysis Plans. As part of the planning, prior sampling information and data provided by the various agencies (ADEM, ADPH, ATSDR) and private parties were reviewed.

The following is a summary of the sampling phases for the removal assessment.

SUMMARY OF REMOVAL ASSESSMENT PHASES

Phase I - Residential Soil Sampling – February 9 through 18, 2000

Phase II - Industrial Soil Sampling – March 20 through 31, 2000

Phase III - Residential Soil Sampling - April 24 through May 10, 2000

Phase IV - Residential Soil and Air Sampling – June 12 through 30, 2000

Phase V - Residential Soil Sampling – July 23 through August 4, 2000

Attachment A presents several tables with types of analyses and number of samples or locations by phases.

In January, as part of the initial planning, and later in May and June 2000, EPA held meetings in Anniston with representatives from EPA Waste Management Division, ADEM, ADPH, EPA Science and Ecosystem Science Division (EPA SESD). The meetings focused on sampling activities and future plans.

Phase I - Residential Soil Sampling

On February 9, 2000, EPA OSC and EPA Region 4 Superfund Technical Assessment and Response Team (START) contractor mobilized to the site for Phase I activities and began field screening for PCBs. On February 13 and 14, 2000, additional START personnel and EPA SESD mobilized to the site to collect grab surficial soil samples for laboratory analysis. START contractor collected and screened 156 grab soil samples with a Dexsil L2000 PCB/Chloride analyzer (L2000 PCB analyzer) to identify hot spots of possible contamination. EPA SESD collected 166 soil samples for the following analyses: 137 for PCBs, 20 for dioxins, and 9 for volatile organic compounds (VOC), semivolatile organic compounds (SVOC), and target analyte listed (TAL) metals. EPA SESD completed soil sampling and demobilized from the site on February 17, 2000. START contractor completed field screening activities and demobilized from the site on February 18, 2000.

Phase II - Industrial and Residential Soil Sampling

On March 20, 2000, EPA OSC, ADEM representatives and START contractor mobilized to the site for Phase II activities and began collecting grab soil samples from 20 industrial facilities including foundries located throughout Anniston. These soil samples were analyzed for PCBs, total cyanide, and Resource Conservation and Recovery Act (RCRA) 8 total metals. Also, grab soil samples were collected to screen with an x-ray fluorescence (XRF) spectrometer. A Geoprobe® and hand augers were used to collect surficial soil samples for screening and laboratory analysis. Soil samples were also collected from the Alabama Power Company's facility that is located north of the WEL and from areas along the railroad lines and Snow Creek. Water, sediment, and waste samples were collected from out falls, drainage areas, and creeks for characterization by field screening and laboratory confirmation. Sampling activities were completed on March 30, 2000.

Phase III -Residential Sampling

On April 24, 2000, EPA OSC, EPA-SESD, and START contractor mobilized to the site for Phase III activities. During Phase III activities, EPA SESD collected 160 grab soil samples from 80 residential properties for CLP laboratory analysis. EPA SESD also collected 20 PCB congener samples, 2 drinking water samples, 1 surface water sample, and 12 waste samples for analysis by the SESD laboratory. START collected 509 grab soil samples for field screening with the L2000 PCB analyzer, and collected 2 drinking water samples, 1 surface water sample, and 6 waste samples for laboratory analyses.

Split grab soil samples for the 80 properties were collected and submitted to community representatives. The samples collected for the 80 properties were submitted to CLP laboratory for PCB, SVOC, and TAL metal analyses; 10 samples were selected for VOC analysis, and 20 were selected for congener analysis. One of the soil samples collected at each of the 80 residential locations was also submitted for cyanide analysis.

The START contractor analyzed 25 grab soil samples of waste and other samples using the L2000 PCB analyzer. Twelve SESD waste samples (consisting of foundry slag, sediment, and a black, tar-like waste material) were collected and submitted for laboratory analysis.

In addition, SESD collected two drinking water samples from residences for laboratory analysis. EPA SESD completed sampling activities and demobilized from the site on April 28, 2000. On April 28, 2000, START contractor had analyzed 33 soil samples and 4 waste samples with the L2000 PCB analyzer and shipped 81 soil and 6 waste samples to the fixed laboratory for confirmation analyses.

On April 29, 2000, EPA and START contractor continued collecting grab soil samples from residential locations for PCB field screening and fixed laboratory analysis. From

April 29 through May 9, 2000, START contractor collected 874 grab soil samples from 257 residences, 1 school, and 1 facility. During this period, START analyzed 456 grab soil samples with the L2000 PCB analyzer and shipped 418 soil samples to the fixed laboratory for analysis. On April 29, 2000, a suspected discharge was observed in unnamed creek, possibly originating from a nearby industrial facility (near Eulaton Street); therefore, the START contractor collected one water sample from the creek and submitted the sample to the laboratory for PCB, RCRA 8 total metal, SVOC, and VOC analyses.

On May 4, 2000, START collected 10 grab soil samples at Tull Chemical Company, located in Oxford, Alabama, in level B personal protective equipment. Tull Chemical Company had manufactured a highly toxic rodenticide composed of sodium monofluoroacetate, also known as Compound 1080. This facility was the 21st of the original 22 facilities identified for sampling in Phase II. The 10 samples were shipped to the laboratory for fluoride, PCB, RCRA 8 total metal, and sodium analyses.

In addition, on May 10,2000, START contractor delivered to ADEM 945 samples of Phase III residential soil samples to be screened with the XRF spectrometer. All START personnel involved with sampling activities demobilized from the site on May 10, 2000.

Phase IV - June Residential Soil and Air Sampling

On June 12, 2000, START contractor mobilized to the site to conduct Phase IV removal activities that included the collection of air and soil samples. From June 13 through 17, 2000, low-flow air samples were collected at nine residential locations to determine background ambient air concentrations. The low-flow air sampling locations were selected from data collected during earlier sampling phases. The low-flow air samples were collected by placing two air sampling stations downwind and one air sampling station upwind relative to the predominant wind direction. START contractor submitted 27 low-flow air samples along with four field blanks to the laboratory for analysis of PCBs including Aroclor 1268 and RCRA 8 total metals including mercury.

From June 14 through 22, 2000, START contractor conducted quality control tests on L2000 PCB analyzer to determine the usefulness of the instrument and to determine the representativeness and comparability of the PCB field screening results to the fixed laboratory. The tests included analyzing performance evaluation samples, laboratory control samples, instrument blanks, and method blank.

On June 15 through 20, 2000, START contractor collected composite soil samples from 31 residential locations that were previously sampled and had PCB values greater than 10 mg/kg from fixed laboratory analysis and greater than 8.5 mg/kg from field screening. During sampling activities, split composite soil samples were collected at 13 residence

locations. The 64 soil samples collected from the 31 residential locations were submitted to the CLP laboratory for analysis of PCBs including Aroclor 1268 and TAL metals.

On June 20 and 21, 2000, composite soil samples were collected from the 24 residential locations and 3 Head Start Centers for field screening with the L2000 PCB analyzer for PCBs and XRF spectrometer for metals. From these locations, 14 composite soil samples were selected and shipped to the fixed laboratory for confirmation analysis of PCBs including Aroclor 1268, SVOCs, organo chlorine pesticides, chlorinated herbicides, and TAL metals.

From June 19 through 23, 2000, START collected and screened 30 composite soil samples and 100 in situ screening points with the XRF spectrometer to determine instrument calibration and site-specific standards. Fifteen soil samples were selected and submitted to the fixed laboratory for confirmation analyses of metals identified with XRF spectrometer.

From June 27 through 30, 2000, EPA SESD and START contractor collected 24 hours, high-volume air samples for analyses of PCBs and congeners from eight air monitoring stations located throughout the Anniston area.

Phase V - Residential Soil Sampling

On July 23 and 24, 2000, START contractor and EPA-SESD mobilized to the site to conduct Phase V activities. A total of 180 composite soil samples from 90 locations throughout Anniston were collected from July 24 to 26, 2000. Also, on July 26, 2000, START and SESD collected soil samples from 10 locations targeted for PCB congener analyses for ATSDR. START field screened 24 soil samples for PCBs with the L2000 PCB analyzer and collected in-situ XRF spectrometer readings for metals at 42 locations around the industrial facility, Huron Valley facility and surrounding ditches.. In addition, START collected 37 composite soil samples from 17 locations for PCBs with the L2000 PCB analyzer and metal field screening with XRF spectrometer.

On July 27, 2000, START contractor field screened 45 soil samples with the L2000 PCB analyzer and collected in situ XRF spectrometer readings at 28 locations near Huron Valley facility. START contractor collected 59 composite soil samples from 25 locations in the City of Oxford and 3 locations in Anniston for PCB and metal field screening.

On July 28, 2000, START contractor field screened 54 soil samples with the L2000 PCB analyzer and 62 soil samples with the XRF spectrometer. START also collected 10 in situ XRF spectrometer readings for metals at 10 locations near Clydesdale Street. START collected 61 composite soil samples from 30 locations for PCB and metal field screening.= On July 29, 2000, START contractor field screened 31 soil samples with the L2000 PCB analyzer and 68 soil samples with the XRF spectrometer. START also collected 8 in situ XRF spectrometer readings for metals at 10 locations near Clydesdale

Street. START collected 39 composite soil samples from 19 locations for PCB and metal field screening.

On July 31, 2000, START contractor field screened 39 soil samples with the L2000 PCB analyzer and 71 soil samples with the XRF spectrometer including 6 soil samples collected by ADEM at the Lauderdale facility. START contractor collected 42 composite soil samples from 20 locations including the a community and swim center and two elementary schools for PCB and metal field screening and laboratory analysis.

On August 1, 2000, START contractor shipped 44 soil samples to the fixed laboratory for PCB and TAL metal analysis. Two of these samples were also selected for VOC, SVOC, organic chlorine pesticide, chlorinated herbicide, and total inorganic chloride for performance evaluation of the L2000 PCB analyzer. START contractor collected 67 composite soil samples from 14 locations including the two community centers. START contractor field screened 46 soil samples with the L2000 PCB analyzer and 73 soil samples with the XRF spectrometer.

On August 2, 2000, START contractor shipped 32 soil samples to the fixed laboratory for PCB and TAL metal analysis. A EPA SESD representative was on-site and performed an audit of the START sampling activities. START contractor delivered 20 soil samples to the EPA SESD representative for PCB analysis by the EPA SESD laboratory and also shipped 20 soil samples to a CLP laboratory for TAL metal analysis. START contractor collected 43 composite soil samples from 19 locations including two community centers. START contractor field screened 50 soil samples with the L2000 PCB analyzer and 83 soil samples with the XRF spectrometer. In addition, START assisted EPA SESD and ADEM in the collection of soil samples at the former toxic pond located between U.S. Highway 202 and Jefferson Street.

On August 3 and 4, 2000, START contractor demobilized from the site at the completion of sampling activities. On August 3, 2000, START contractor field screened 63 soil samples for PCBs with the L2000 PCB analyzer and collected 30 soil samples for metals using in situ XRF spectrometer readings at local daycare centers. START contractor shipped 8 soil samples collected from the former toxic pond to the fixed laboratory for PCB, TAL metal, TCLP metal, and SVOC analysis and 5 soil samples from residential locations for PCB and TAL metal analysis.

On August 7, 2000, the EPA held two data availability sessions with the community to present the findings of PCBs sampling and the lead results greater than 400 parts per million. Also, on August 8 and 9, 2000, START contractor continued collecting in situ XRF spectrometer readings from public areas and completed analyses of the remaining soil samples collected the first week of August with the XRF spectrometer.

On February 2, 2000, the EPA Superfund Removal Program opened a community relations center (CRC) located in downtown Anniston, Alabama. The CRC served the community as an information center, distributing brochures and fact sheets, answering 2,871 calls, and providing services to over 658 visitors, as of August 11, 2000. The CRC was staffed by EPA community relations specialist, START contractor information personnel, and representatives from ADEM and ATSDR. Numerous newspaper and television stories were coordinated with the CRC. The EPA staff worked very closely with two major community groups, Community Against Pollution (CAP) and Sweet Valley/Cobbtown Environmental Justice (SVCEJ) Task Force to ensure effective community involvement in the EPA's activities at the Site.

ANALYTICAL RESULTS

The primarily constituents identified in the analysis of the soil samples at residential and commercial properties, public areas or industrial sites were PCBs and lead. Other constituents identified in some soils included other metals (arsenic and mercury) and pesticides (DDT, dieldrin, chlordane and toxaphene.) Also, Polyaromatic Hydrocarbons (PAHs) including benzo(a) pyrene were identified in soils on a few properties and in drainage areas. PCBs were also detected in air samples.

- PCB Soil Sampling Results - (Residential, Commercial, and Public Areas)

EPA SESD laboratory analytical results from Phase I (February 2000) grab soil sampling of 69 locations identified 33 residential properties that had PCBs greater than or equal to 1.0 mg/kg and two residential properties, one commercial enterprise, and one residential property with a creek which had PCBs greater to or equal to 10 mg/kg.

EPA SESD laboratory analytical results from Phase III (April 2000) grab soil sampling of 80 locations identified 47 samples which had PCBs greater or equal to 1.0 mg/kg but less than 10 mg/kg and identified 6 soil samples and 2 waste samples which had greater than or equal to 10.0 mg/kg. Of the 6 soil samples, the levels detected ranged from 12.1 to 87.6 mg/kg and were detected on 3 residential properties and 1 residential property with a creek.

In June 2000, EPA completed an evaluation of preliminary PCB field screening data and partially available laboratory analytical data collected from grab sampling of residential properties from previous sampling phases and EPA-SESD (June 1999) soil investigation. This evaluation of grab samples identified the presence of PCB contamination of greater than 1.0 mg/kg at approximately 260 residential properties and approximately 10.0 mg/kg at 31 residential properties.

To confirm these preliminary results of the 31 residential properties, EPA conducted Phase IV (June 2000) composite sampling for PCBs by collecting five aliquots, zero to three inches below land surface, front and back yards of the residential properties. The

analytical results from this composite soil sampling identified 6 residential properties which had PCBs equal to or greater than 10.0 mg/kg.

Also, in June 2000, EPA completed an evaluation of preliminary PCB field screening data and partially available analytical laboratory data collected from grab sampling of commercial enterprises, drainage ditches and public areas. This June evaluation of data from grab sampling indicated the presence of PCB contamination approximately at 10 mg/kg on three commercial enterprises, one public vacant lot, and along several drainage ditches.

For EPA SESD Phase V (July/August 2000) sampling, composite sampling continued for 80 additional residential properties. Some sample locations selected for this phase had levels of PCBs at approximately 10 mg/kg identified in previously from grab sampling. Other sample locations were new sampling sites predominately in low drainage areas. Phase V (July/August 2000) sampling was similar to June as samples were collected as composites of five aliquots, zero to three inches below land surface, front and back yards of the residential properties. Results from EPA SESD laboratories indicated the presence of contamination of PCBs in 53 samples equal to or greater than 1.0 mg/kg but less than 10.0 mg/kg. There were 11 samples which contained PCBs greater than or equal to 10.0 mg/kg.

A summary of the 11 composite samples with PCBs greater than or equal to 10.0 mg/kg in soils from EPA SESD Phase V (July/August) sampling are as follows: (1) one sample had PCBs detected at 5,501 mg/kg along a drainage ditch near the railroad tracks and Clydesdale Street, (2) two samples were at residential locations previous identified with similar values in the Phase IV composite sampling , (3) one sample was at a residential property with a creek , and (3) the remaining samples were in low drainage areas or sediments in creeks (11th street and Snow creek, 11th street ditch near Project Drive, low drainage areas near alley way off Brown Street, a ditch near Clydesdale and railroad tracks, a ditch near Alabama Power Company/Solutia's property line and railroad tracks, sediment in Snow creek near Glenaddie and 6th Street.)

- PCB Soil Sampling Results - (Industrial)

START laboratory analytical data from Phase II (March 2000) grab soils identified seven industrial facilities with PCBs equal to or greater than 10 mg/kg. These results ranged from 10.6 to 490 mg/kg. Elevated PCB levels were also detected in grab samples collected along drainage ditches, running parallel to several rail road tracks (starting at Ledbetter Street and extending eastward, terminating at the 10th street bridge and continuing from 10th Street bridge toward City of Oxford terminating at U.S. Highway 431/21 bridge over Snow Creek). The analytical results from this sampling ranged from 13 to 3,650 mg/kg.

- Lead Sampling Results - (Residential and Public Areas)

Results from Sampling Phases I, II, IV and V indicated concerns for lead contamination in residential, low drainage areas and Public Areas.

EPA SESD laboratory analytical results from Phase I (February 2000) grab sampling identified the presence of lead contamination at elevated level of 1,000 mg/kg at a residential property with a creek. Lead levels for other residential samples ranged from 2.0 to 170 mg/kg.

EPA SESD laboratory Phase III (April 2000) grab sampling identified elevated levels of lead in 14 samples or 12 residential locations ranging from 400 mg/kg to 2,900 mg/kg. Elevated lead levels were also identified in 4 waste samples collected in low drainage areas and creeks ranging from 590 to 2,000 mg/kg.

EPA SESD laboratory Phase IV (June 2000) composite sampling at 31 residential properties identified 62 samples with lead ranging from 62 to 2,800 mg/kg. Fifteen samples contained lead above 400 mg/kg.

EPA SESD laboratory Phase V (July/August 2000) composite sampling at residents in drainage areas identified elevated levels of lead ranging from 420 mg/kg to 6,300 mg/kg for 29 surface soil samples. Of these 29 samples, four were in ditches or creeks and the remaining 25 were in residential/public areas.

ADEM Phase III XRF field screening data indicated the presence of lead contamination on 47 residential properties with lead above 400 mg/kg.

- Lead Soil Sampling Results - (Industrial)

START laboratory analytical data from Phase II (March 2000) grab soil sampling indicated levels of lead above 400 mg/kg for 11 industrial sites. These results ranged from 410 to 19,000 mg/kg. Elevated lead levels were also detected in grab soil samples collected along drainage ditches, running parallel to several rail road tracks (starting at Ledbetter Street and extending eastward, terminating at the 10th street bridge and continuing from 10th Street bridge toward City of Oxford terminating at U.S. Highway 431/21 bridge over Snow Creek). The analytical results from this drainage ditch sampling ranged from 420 to 6,200 mg/kg.

- PCB Air Monitoring Results -

During EPA SESD Phase IV (June 2000) Air Monitoring Study, 24 hour high volume air samples were collected from 8 sites within 1/4 mile ring around the Solutia main property. The purpose of this study was to assess PCBs (aroclors and congeners) concentrations in ambient air. This was a follow up of an earlier investigation conducted by EPA SESD in June 1999.

Air sampling results from June sampling detected PCB congeners in various combinations of PCB congeners 28, 60, 74 and 156 at one or more air sampling sites. The air monitoring located at Ware Street and 9th Street detected PCB Aroclor 1242 at 0.045 micrograms per cubic meter with a total of PCB congeners of 0.0083 micrograms per cubic meter.

- Other Constituents -

EPA SESD laboratory analytical results from Phase I (February 2000) and Phase III (April 2000) grab sampling, identified DDT or its breakdown products, DDE and DDD, in several samples at low levels which ranged from below 1 mg/kg to 4.4 mg/kg. And, elevated levels of dieldrin, were detected at three locations with a range from 4.5 to 11 mg/kg during Phase III (April 2000) grab sampling. Elevated levels of toxaphene were also detected during EPA SESD Phase III (April 2000) grab sampling at two residential locations with levels of 6,000 mg/kg and 1,500 mg/kg. And, during EPA SESD Phase I (February 2000) grab sampling, chlordane was detected in many soil samples.

EPA SESD Phase I (February 2000) grab sampling, detected Polyaromatic Hydrocarbons (PAHs) in approximately 100 samples. In both EPA SESD Phase I (February 2000) and Phase III (April 2000) grab sampling, elevated levels of benzo(a) pyrene were identified at one residential sampling location with both benzo(a) yrene and other PAHs identified at a residential property with a creek. Elevated levels of benzo(a) pyrene were detected at two sampling locations on Snow Creek (11th Street and Snow Creek and waste outfall near a foundry) from composite sampling during EPA SESD Phase V (July/August 2000).

EPA SESD Phase III (April 2,000) grab sampling, identified elevated levels of arsenic at two residential locations. These levels ranged from 60 mg/kg to 120 mg/kg.

EPA SESD Phase I (February 2000) and Phase III (April 2000) grab sampling identified very low levels of mercury (0.13 to 14 mg/kg) at 55 residential sampling locations.

EPA SESD Phase V (July/August 2000) composite sampling, detected elevated levels of arsenic in three samples ranging from 40 mg/kg to 89 mg/kg along railroad tracks (Ledbetter to Clydesdale Streets) and in samples of one residential property.

CONCLUSIONS

Approximately 2,500 soil samples (grabs and composites) were collected from more than 800 locations for all five phases of the removal assessment conducted from early February to August 2000. These samples included sampling and laboratory analyses conducted by EPA SESD and START contractor with some XRF field screening data provided by ADEM. This report primarily contains synopsis of laboratory analytical data generated by EPA SESD and field screening data generated by START contractor and ADEM. Additional laboratory data and field screening data generated by the START contractor is under going data validation and should be available in early 2001.

The primarily constituents identified in soils during this reporting period were PCBs and lead. Other constituents identified in some soils included other metals (arsenic and mercury) and pesticides (DDT, dieldrin, chlordane and toxaphene.) Also, Polyaromatic Hydrocarbons (PAHs) including benzo(a) pyrene were identified on a few properties and in drainage areas.

During EPA SESD Phase IV (June 20000 Air Monitoring Study, 24 hours, high volume air samples were collected from 8 sites.

Air sampling results detected PCB congeners in various combinations of PCB congeners 28, 60, 74 and 156 at one or more air monitoring sampling sites. One air monitoring station detected PCB Aroclor 1242

RECOMMENDATIONS I recommend taking a time critical removal action at the Site for the following reasons:

SOIL EXPOSURE PATHWAY -

A. PCBs:

Preliminary PCB field screening data and partially available laboratory analytical data collected from grab and composite soil sampling of residential properties from Phase I (February), Phase III (April) and Phase IV (June) sampling phases and EPA-SESD (June 1999) soil investigation indicated the presence of PCBs in soils. PCB contamination with levels greater than 1.0 mg/kg at approximately 260 residential properties was identified by grab soil sampling. PCB contamination with levels equal to or greater than 10.0 mg/kg at six residential properties was identified by composite soil sampling.

PCBs identified on the six residential properties with levels equal to or greater than 10 mg/kg may pose an immediate threat to public health. ATSDR has concurred with the recommendation that 10 mg/kg is a site specific trigger for a removal action at the Site. This is a short term remedy that will be protected of human health.

Preliminary PCB field screening data and partially available laboratory analytical data collected from grab and composite soil sampling from Phase I (February) 2000, Phase II (March) 2000, Phase III (April) 2000 and Phase V (July/August)2000 identified the presence of PCBs in soils along low drainage areas, ditches and creeks.

Several residential properties are located in areas flooded during episodic heavy rain events. There also exists the potential of PCB contamination to migrate from contaminated ditches, creeks and low drainage areas to adjacent residential areas.

These results and site topography suggests that further investigation is required to determine extent of PCB contamination of soils.

B. LEAD:

Preliminary field screening data and partially available laboratory analytical data collected from grab and composite sampling of residential properties during Phase I (February 2000), Phase III (April 2000), Phase IV (June 2000), and Phase V (July/August 2000) sampling indicated the presence of lead in soils at 57 residential and 11 industrial properties.

EPA has proposed a lead concentration of 400 ppm or mg/kg in soils as a "level of concern." Based on available data, as well as, the current knowledge of the site specific conditions, ATSDR concluded that residential soils lead levels above 400 ppm represent a public health hazard. (Please refer to reference 6, Section VIII.)

There was also lead identified in low drainage areas, ditches and creeks. Several residential properties are located in areas flooded during episodic heavy rain events. There exists the potential of lead contamination to migrate from contaminated industrial properties to adjacent residential areas. There also exists the potential of lead contamination to migrate from contaminated ditches, creeks, and low drainage areas to adjacent residential areas.

These results and site topography suggests that further investigation is required to determine extent of lead contamination in soils.

C. Other constituents::

- Pesticides (dieldrin, toxaphene and chlordane):

Elevated levels of dieldrin, were detected at three locations with a range from 4.5 to 11 mg/kg during Phase III (April 2000) grab sampling. Dieldrin levels detected in soils are above the site specific removal action level of 3.0 mg/kg.

Elevated levels of toxaphene were also detected during EPA SESD Phase III (April 2000) grab sampling at two residential locations with levels of 6,000 mg/kg and 1,500 mg/kg. Toxaphene levels in soils are above the site specific removal action level of 44 mg/kg.

Elevated levels of chlordane were detected during EPA SESD Phase I (February 2000) grab sampling in many soil samples. Chlordane levels in soils at 950 and 1800 are above the site specific removal action level of 105 mg/kg.

This data suggests that further investigation is required for those identified areas with contamination of dieldrin, toxaphene and chlordane in soils.

- Benzo(a) Pyrene and other PAHs:

Elevated levels of benzo(a) pyrene were identified at one residential sampling location with both benzo(a) pyrene and other PAHs were identified at a residential property with a creek during EPA SESD Phase I (February 2000) and Phase III (April 2000) grab sampling. Elevated levels of benzo(a) pyrene were also detected at two sampling locations on Snow Creek during EPA SESD Phase V (July/August 2000). Specifically, the benzo(a) pyrene levels were above the site specific action level of 6.2 mg/kg in soils.

This data suggests that further investigation is required for those identified areas with soil contamination of benzo(a) pyrene and other PAHs detected in soils.

- Arsenic:

Elevated levels of arsenic were identified at six locations during EPA SESD Phase III (April 2,000) grab sampling and during EPA SESD Phase V (July/August 2000) composite sampling. These levels ranged from 60 mg/kg to 120 mg/kg in soils. The site specific removal action level for arsenic in soils is 44 mg/kg.

This data suggests that further investigation is required for those identified areas with contamination of arsenic in soils.

AIR EXPOSURE PATHWAY -

Air sampling results from EPA SESD Phase IV (June 2000) Air Monitoring Study detected PCB congeners in various combinations of PCB congeners 28, 60, 74 and 156 at one or more air monitoring sampling stations. Also, at one air monitoring station PCB Aroclor 1242 was detected at 0.045 micrograms per cubic meter. The level of PCB

Aroclor 1242 of 0.045 micrograms per cubic meter detected at the one air monitoring station is above 0.0034 microgram per cubic meter for 10-6 risk, EPA's acceptable risk for long term exposure as defined in EPA Region 9 Preliminary Remediation Goal (PRP) Table, dated October 1999.

This data suggests that further investigation is required to determine the extent of contamination in air.

FUTURE ACTIONS

- A. Conduct a time critical removal action, as a short term remedy to reduce health risks, on the six residential properties identified during composite sampling in June 2000.
- B. Continue to evaluate past and future laboratory analytical data and field screening data to determine if composite soil sampling and follow-up removal actions are required to mitigate any immediate threat to public health from the contamination PCBs, lead, and other constituents.
- C. Conduct a remedial investigation to determine the extent of PCB, lead and other contamination in soils and in air. This investigation should include the evaluation of potential contamination from industrial properties and from drainage ditches, creeks and low drainage areas adjacent to residential, commercial and public areas.

POLREP #6, 09/08/00

Actions Taken On July 23 and 24, 2000, START and SESD mobilized to the site to conduct Phase 5 removal site assessment activities. From July 24 through 26, 2000, START and SESD collected 180 composite soil samples from 90 locations throughout Anniston. Also, on July 26, 2000, START and SESD collected soil samples from 10 locations for an ATSDR consultation. START field screened 24 soil samples for PCBs with the Dexsil L2000 and collected insitu XRF spectrometer readings for metals at 42 locations around Huron Valley and the railroad. In addition, START collected 37 composite soil samples from 17 locations for PCB and metal field screening.

On July 27, 2000, START field screened 45 soil samples with the Dexsil L2000 and collected insitu XRF spectrometer readings at 28 locations near Huron Valley and the railroad. START collected 59 composite soil samples from 25 locations in Oxford and 3 locations in Anniston for PCB and metal field screening.

On July 28, 2000, START field screened 54 soil samples with the Dexsil L2000 and 62 soil samples with the XRF spectrometer. START also collected 10 insitu XRF spectrometer readings at 10 locations near Clydesdale. START collected 61 composite soil samples from 30 locations for PCB and metal field screening.

On July 29, 2000, START field screened 31 soil samples with the Dexsil L2000 and 68 soil samples with the XRF spectrometer. START also collected 8insitu XRF spectrometer readings at 10 locations near Clydesdale. START collected 39 composite soil samples from 19 locations for PCB and metal field screening.

On July 31, 2000, START field screened 39 soil samples with the Dexsil L2000 and 71 soil samples with the XRF spectrometer including 6 soil samples collected by ADEM at the Lauderdale facility. START collected 42 composite soil samples from 20 locations including the Carver Community and Swim Center, Cobb Elementary School, and 10th Street School for PCB and metal field screening and laboratory analysis.

On August 1, 2000, START shipped 44 soil samples to the fix laboratory for PCB and TAL metal analysis. Two of these samples were also selected for VOC, SVOC, organochlorine pesticide, chlorinated herbicide, and total inorganic chloride for performance evaluation of the Dexsil L2000. START collected 67 composite soil samples from 14 locations including the Cooper and Glenaddie Community Centers. START field screened 46 soil samples with the Dexsil L2000 and 73 soil samples with the XRF spectrometer.

On August 2, 2000, START shipped 32 soil samples to the fix laboratory for PCB and TAL metal analysis. A SESD representative was on-site and performed an audit of the START removal site assessment activities. START delivered 20 soil samples to the SESD representative for PCB analysis by the SESD laboratory and also shipped 20 soil samples to a CLP laboratory for TAL metal analysis. START collected 43 composite soil samples from 19 locations including the Cooper and Glenaddie Community Centers. START field screened 50 soil samples with the Dexsil L2000 and 83 soil samples with the XRF spectrometer. In addition, START assisted SESD in the collection of soil samples with the geoprobe® at the former toxic pond located between U.S. Highway 202 and Jefferson Street.

On August 3 and 4, 2000, START demobilzed from the site at the completion of removal site assessment activities. On August 3, 2000, START field screened 63 soil samples for metals with the Dexsil L2000 and collected 30 insitu XRF spectrometer readings from local daycare centers. START shipped 8 soil samples collected from the former toxic pond to the fix laboratory for PCB, TAL metal, TCLP metal, and SVOC analysis and 5 soil samples from residential locations for PCB and TAL metal analysis. On August 4, 2000, START shipped 10 data packages from Phase 3 to SESD for data validation.

On August 7, 2000, the EPA held two public data availability sessions to present the findings of the Phase 1 and the lead results greater than 400 parts per million (ppm) from all phases.

Also, on August 8 and 9, 2000, START continued collecting insitu XRF spectrometer readings from public areas and analyzing the remaining soil samples collected last week with the XRF spectrometer. B. Future Actions EPA and START will continue the evaluation of data collected to date to plan future removal site assessment activities.

START will continue data validation of Phase 3 and Phase 4 data packages and begin data validation of Phase 5 results when the data packages are received.

POLREP #5, July 11, 2000

Actions Taken

The CRC serves the community as an information center, distributing brochures and fact sheets, answering over 2,032 calls, and providing services to over 555 visitors to the CRC as of June 26, 2000.

On April 25, 2000, EPA SESD and START began soil sampling activities at 80 residential properties throughout Anniston. Split soil samples were collected and submitted to community representatives. One hundred sixty SESD soil samples were collected from the 80 residential locations and submitted for PCB, SVOC, and TAL metal analyses; 10 samples were selected for VOC analysis, and 20 were selected for congener analysis. One of the soil samples collected at each of the 80 residential locations was also submitted for cyanide analysis. START analyzed 25 soil samples using the L2000 analyzer. Twelve SESD waste samples (consisting of foundry slag, sediment, and a black, tar-like material) were collected and submitted for laboratory analysis. In addition, SESD collected two drinking water samples from residences for laboratory analysis. EPA SESD completed sampling activities and demobilized from the site on April 28, 2000. As of close of business on April 28, 2000, START had analyzed 33 soil samples and 4 waste samples with the L2000 analyzer and shipped 81 soil and 6 waste samples to the fixed laboratory for analysis

On April 29, 2000, EPA and START continued collecting soil samples from residential locations for PCB field screening and fixed laboratory analysis. From April 29 through May 9, 2000, START collected 874 soil samples from 257 residences, 1 school, and 1 commercial facility. During this period, START analyzed 456 soil samples with the L2000 analyzer and shipped 418 soil samples to the fixed laboratory for analysis. On April 29, 2000, a suspected discharge was observed in Coldwater Creek, possibly originating from a nearby commercial facility; therefore, START collected one water sample from the creek during the observed discharge and submitted the sample to the laboratory for PCB, RCRA 8 total metal, SVOC, and VOC analyses.

On May 4, 2000, START collected 10 soil samples at Tull Chemical, located in Oxford, Alabama, in level B personal protective equipment. Tull Chemical had manufactured a highly toxic rodenticide composed of sodium monofluoroacetate, also known as Compound 1080. The 10 samples were shipped to the laboratory for fluoride, PCB, RCRA 8 total metal, and sodium analyses

START completed Phase III sampling activities on May 9, 2000, and prepared to demobilize. The total number of properties sampled, samples collected, samples collected

for field screening, and samples collected for fixed laboratory analysis, including samples collected by START and SESD, are as follows: number of properties sampled -339; number of samples collected -1,076 (some of these samples overlap; that is, they were screened in the field and sent to the fixed laboratory); number of samples field screened -514; and number of samples shipped to the fixed laboratory for analysis -509.

On May 10, 2000, an EPA-led Blue Ribbon Panel meeting was held in Anniston with representatives from EPA, ADEM, ADPH, EPA SESD, and START. The meeting focused on Phase I residential sampling activities and results as well as sampling techniques and future plans.

In addition, on May 10 ,2000, START delivered to ADEM approximately 945 samples of Phase III residential soil samples to be screened with the XRF spectrometer. All START personnel involved with sampling activities demobilized from the site.

On June 12, 2000, START mobilized to the site to conduct Phase 4 removal activities that included the collection air and soil samples. From June 13 through 17, 2000, low-flow air samples were collected at nine residential locations to determine background ambient air concentrations. The low-flow air sampling locations were selected from data collected during past removal site assessments. The low-flow air samples were collected by placing two air sampling stations downwind and one air sampling station upwind relative to the predominant wind direction. START submitted 27 low-flow air samples along with four field blanks to the laboratory for analysis of PCBs including Aroclor 1268 and RCRA 8 total metals including mercury.

From June 14 through 22, 2000, START conducted quality control tests on Dexsil L2000 PCB/Total Chloride analyzer to determine the usefulness of the instrument and to improve the representativeness and comparability of the PCB field screening results to the fixed laboratory. The tests included analyzing performance evaluation samples, laboratory control samples, instrument blanks, and method blank.

On June 15 through 20, 2000, START collected composite soil samples from 31 residential locations that were previously sampled and had PCB values greater than 10 parts per million. During sampling activities, split composite soil samples were collected at 13 residence locations. The 64 soil samples collected from the 31 residential locations were submitted to the Contract Laboratory Program laboratory for analysis of PCBs including Aroclor 1268 and TAL metals. On June 20 and 21, 2000, composite soil samples were collected from the 24 residential locations and 3 Head Start Centers for field screening with the L2000 for PCBs and XRF spectrometer for metals. From these locations, 14 composite soil samples were selected and shipped to the fixed laboratory for analysis of PCBs including Aroclor 1268, SVOCs, organochlorine pesticides, chlorinated herbicides, and RCRA 8 Total Metals.

From June 19 through 23, 2000, START collected and screened 30 composite soil samples and 100 insitu screening points with the XRF spectrometer to determine instrument calibration and site-specific standards. Fifteen soil samples were selected and

submitted to the fixed laboratory for total metal analysis to compare with the XRF spectrometer results.

From June 27 through 30, 2000, SESD and START collected high-volume air samples for analysis of PCBs and congeners from eight locations throughout the Anniston area.

On June 29, 2000, a meeting was held with representatives from EPA,. SESD, ADEM, and START to discuss the Phase 2 results and to plan future actions.

Future Actions

On July 23, 2000, EPA, SESD, and START will mobilize to the site to conduct Phase 5 removal assessment activities that will include the collection of composite soil samples from residential locations. From July 24 through 27, 2000, SESD and START will collect composite samples at 80 new residential locations for analysis of SVOCs, pesticides/PCBs, and total metals. Also, confirmation composite soil samples will be collected at 20 residential locations that were previously sampled. In addition, composite soil samples will be collected from about 100 locations for PCB and metal field screening and confirmation by fixed laboratory analysis. START and ADEM will collected soil samples from the remaining industrial facility from Phase 2.

Sample Summary and Organizational Roster (PDF, 19K)

POLREP #3, May 3, 2000

Actions Taken:

On March 20, 2000, EPA-OSC, ADEM, and the START contractor mobilized to the site and began collecting soil samples from 22 commercial facilities including foundries located throughout Anniston for PCBs, total cyanide, and Resource Conservation and Recovery Act (RCRA) 8 total metals. Also, soil samples were collected for ADEM to screen with the x-ray florescence (XRF) spectrometer. A geoprobe® and hand augers were used to collect surficial soil samples for screening and laboratory analysis. Sampling of commercial facilities with ADEM was completed on April 24, 2000. Soil samples were also collected from the Alabama Power facility that is situated north of the WEL and from areas along the railroad lines and Snow Creek. Water, sediment, and waste samples were collected from out falls, drainage areas, and springs for characterization by field screening and laboratory confirmation. Sampling activities were completed on March 30, 2000.

On April 24, 2000, EPA-OSC, EPA-SESD, and the START contractor mobilized to the site for phase 3 activities. On April 25, 2000, soil sampling activities began at 49

represented and 31 non-represented residential properties throughout Anniston. The soil samples collected from the represented properties for laboratory analysis were witnessed by community representatives and split soil samples were collected and submitted to the community representatives at every represented residential location. The 160 soil samples collected from the 80 residential locations were submitted for PCB, SVOC, and TAL metal analyses, 10 of which were selected for VOC analysis, and 20 for congeners analysis. One soil sample collected at each of the 80 residential locations was also submitted for cyanide analysis. START analyzed 25 of the soil samples collected at 80 residential locations using the Dexsil L2000 PCB/Chloride analyzer (L2000). Also, 12 waste samples consisting of foundry slag, sediment, and a black, tar-like material were collected and submitted for laboratory analysis. In addition, drinking water samples were collected from one represented residence and one non-represented residence for laboratory analysis. EPA-SESD completed sampling activities and demobilized from the site on April 28, 2000. On April 28, 2000, START collected one waste slag sample and submitted it to the laboratory for toxicity characteristic leaching procedure (TCLP), PCB and TCLP metal analysis.

Future Actions:

EPA and START will continue collecting soil samples from drainage and residential locations for field screening and laboratory analysis. On May 4, 2000, soil samples will be collected in level B personal protective equipment at the Tull Chemical facility that manufactures a highly toxic rodenticide in Anniston. All sampling activities for phase 3 are anticipated to be completed by May 10, 2000. On May 10, 2000, all parties involved with sampling activities will meet to review and discuss the phase 1 and 2 analytical results. Also, EPA will be planning to collect ambient air samples by early July of 2000.

POLREP #2, April 12, 2000

Actions Taken:

On February 9, 2000, EPA-OSC and the START contractor mobilized to the site and began field screening for PCBs. On February 13 and 14, 2000, additional START personnel and EPA-SESD mobilized to the site to collect soil samples for laboratory analysis. START collected and screened 156 soil samples with the Dexsil L2000 PCB/Chloride analyzer. EPA-SESD collected 137 soil samples for PCB analysis, 20 for dioxin analysis, and 9 for PCBs, dioxin, volatile organic compound (VOC), semi-volatile organic compound (SVOC), and target analyte list (TAL) metal analyses. EPA-SESD completed soil sampling and demobilized from the site on February 17, 2000. START completed soil sampling for field screening and demobilized from the site on February 18, 2000.

On March 20, 2000, EPA-OSC, ADEM, and the START contractor mobilized to the site and began collecting soil samples from 22 commercial facilities including foundries located throughout Anniston for PCBs, total cyanide, and Resource Conservation and Recovery Act (RCRA) 8 total metals. Also, soil samples were collected for ADEM to screen with the x-ray florescence (XRF) spectrometer. A geoprobe® and hand augers were used to collect surficial soil samples for screening and laboratory analysis. Soil samples were also collected from the Alabama Power facility that is situated north of the WEL and from areas along the railroad lines and Snow Creek. Water, sediment, and waste samples were collected from out falls, drainage areas, and springs for characterization.

On February 2, 2000, EPA Superfund Removal Program opened Community Relations Center (CRC) located in downtown Anniston. As an information center, the CRC has distributed brochures, fact sheets, and has answered approximately 894 calls and provided services to 396 people visiting the center. The CRC is staffed by EPA Community Relations Specialist, START contractor information personnel, as well as, by representatives from ATSDR and ADEM. Numerous newspaper and TV stories were coordinated with the CRC. EPA staff is also working very closely with two major community groups, Community Against Pollution (CAP) and Sweet Valley/Cobb Town Task Force (SVCTTF), to ensure effective community involvement in EPA's activities at the Site.

Future Action:

EPA-SESD will continue the collection of soil samples from residential properties. START will continue field screening soil samples with the PCB analyzer and split samples with SESD for screening. Also, EPA will be planning to collect air samples by summer of 2000. EPA will be sponsoring several public availability sessions, once residents have been notified of their sampling results. It is anticipated that this will occur during June 2000. These sessions will focus on answering questions regarding PCBs and the Superfund ranking process under NPL.

POLREP #1, March 29, 2000

Site Description

The Soutia's Anniston plant is situated on 70 acres of land and is located about 1 mile west of downtown Anniston, Alabama. The site is bounded to the east and west by residential properties, south by U.S. Highway 202, and north by the Northfolk Southern and Erie railroads.

The plant was opened in 1917, when the Southern Manganese Corporation (SMC) started manufacturing ferro-manganese, ferro-silicon, ferro-phosphorous compounds, and phosphoric acid. In the late 1920s, the plant also started manufacturing biphenyls. SMC became Swann Chemical Company (SCC) in 1930, and in 1935, SCC was purchased by Monsanto. In 1935, Monsanto began the production of PCBs, parathion, phosphorous pentasulfide, para-nitrophenol, and polyphenyl. Monsanto ceased the production of PCBs in the early 1970s. In the mid-1980s, Monsanto ceased the production of parathion and phosphorous pentasulfide. Monsanto renamed its chemical division Solutia in 1997 and currently produces para-nitrophenol and polyphenyl compounds at its Anniston plant. During its operational history, the plant disposed of hazardous and nonhazardous waste at two landfills, the west end landfill (WEL) and south end landfill (SEL), which are located adjacent to the plant. The WEL is situated on 6 acres of land, located on the southwestern side of the plant. The WEL is unlined and was used for disposal of the plant's wastes from the mid-1930s until 1961. In 1961, the WEL was purchased by the Alabama Power Company, at which time Monsanto began disposing of wastes at the SEL. The SEL is located southeast of the plant across U.S. Highway 202 and is situated on the lower northeastern slope of Coldwater Mountain. The SEL consists of 10 individual, unlined cells, of which two cells were used for the disposal of hazardous wastes from the plant. Disposal of wastes at the SEL ceased in 1988.

Previous site investigations by the Alabama Department of Public Health (ADPH), the Alabama Department of Environmental Management (ADEM), the Agency for Toxic Substances and Disease Registry (ATSDR), and U.S. Environmental Protection Agency (EPA) Region 4 have determined that the PCB contamination is attributable to the operations at the former Monsanto plant, currently known as Solutia, Incorporated (Solutia).

Actions Taken:

On February 9, 2000, EPA and START contractor mobilized to the site and began field screening for PCBs. On February 13 and 14, 2000, additional START personnel and SESD mobilized to the site to collect soil samples for laboratory analysis. START collected and screened 156 soil samples with the Dexsil L2000 PCB/Chloride analyzer. SESD collected 137 soil samples for PCB analysis, 20 for dioxin analysis, and 9 for volatile organic compound (VOC), semi-volatile organic compound (SVOC), and target analyte list (TAL) metal analyses. SESD completed soil sampling and demobilized from the site on February 17, 2000. START completed soil sampling for field screening and demobilized from the site on February 18, 2000.

Future Action:

On March 20, 2000, EPA, ADEM, and the START contractor will mobilize to the site to conduct soil sampling at commercial facilities throughout Anniston for PCBs, total cyanide, and Resource Conservation and Recovery Act (RCRA) 8 total metals. The START contractor will also collect soil samples from the Alabama Power facility that is situated ontop the WEL and from areas along Snow Creek.